

FILED IN CHAMBERS  
U.S.D.C. Atlanta

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MAR - 8 2015

JAMES N. HATTEN, Clerk  
By: *[Signature]* Deputy Clerk

CASE NO. 1:12-cv-2296-TCB

Securities and Exchange Commission,

Plaintiff,

vs.

Aubrey Lee Price, PFG, LLC, PFGBI,  
LLC, Montgomery Asset Management,  
LLC f/k/a PFG Asset Management,  
Montgomery Asset Management, LLC  
f/k/a PFG Asset Management,

Defendants.

\_\_\_\_\_  
Genworth Life Insurance Company,  
Protective Life Insurance Company,  
Household Life Insurance Company,

Plaintiffs in Intervention,

vs.

Melanie E. Damian, as Receiver for the  
Estate of Aubrey Lee Price, PFG, LLC,  
PFGBI, LLC, Montgomery Asset  
Management, LLC f/k/a PFG Asset  
Management,

Defendant in Intervention.

\_\_\_\_\_  
**RECEIVER'S MOTION TO SEAL**

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Defendant in Intervention, Melanie E. Damian, as the Receiver for the Estate of Aubrey Lee Price, *et al.* (the "Receiver"), pursuant to this Court's order on Instructions to Parties and Counsel [D.E. 6], and with the consent of counsel for Household Life Insurance Company and Protective Life Insurance Company, seeks entry of an order directing the Deputy Clerk of Court to file the following motions and exhibits under seal, and in support thereof states:

The parties have entered into a confidentiality agreement governing certain documents and other evidence in this matter. The agreement incorporates this Court's order governing confidentiality agreements. *See* D.E. 6 at 13-14.

1. The Receiver's Reply In Support of Her Motion for Summary Judgment and Incorporated Memorandum of Law and exhibits thereto contain information designated by the parties as confidential. Accordingly, the Receiver requests that the unredacted versions of these motions and exhibits be filed under seal.

3. The Receiver has chosen to concurrently file redacted versions of these documents and exhibits on PACER as a Notice of Filing, as permitted by the Court's order. D.E. 6 at 14.

4. Accompanying this motion is a proposed order granting the relief requested herein.

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WHEREFORE, the Receiver respectfully requests that this Court enter an order directing the Deputy Clerk of Court to file under seal the unredacted versions of the Receiver's Reply in Support of Her Motion for Summary Judgment and Incorporated Memorandum of Law and exhibits thereto, and grant any further relief that this Court deems just and proper.

Respectfully submitted,

**VER PLOEG & LUMPKIN, P.A.**

/s/ Jason S. Mazer

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**LOCAL RULE 5.1 CERTIFICATION**

By signature below, counsel certifies that the foregoing document was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 3, 2015, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in this manner specified, *via* transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for



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those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

/s/ Jason S. Mazer

**Jason S. Mazer**

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